

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) CASE NO. 17 B 37328
Isaiah T. Lawrence,) HON. Carol A. Doyle
) CHAPTER 13
DEBTOR.)

NOTICE OF MOTION

TO: Tom Vaughn, Chapter 13 Trustee, 55 E. Monroe St. STE 3850, Chicago, IL 60603, via electronic court notification;

See the attached Service List.

Please take notice that on August 18, 2020, at 9:30 a.m., I shall appear before the Honorable Judge Doyle or any judge sitting in her place, and present the motion to modify plan, a copy of which is attached.

This motion will be presented and heard telephonically. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at www.CourtSolutions.com or by calling Court Solutions at (917) 746-7476.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he served this notice and the attached motion on July 17, 2020, on each entity shown on the attached list at the address shown and by the method indicated on the list via U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603.

/s/ Nicholas Landi
Attorney for Debtor

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
(312) 913-0625
nlandi@semradlaw.com

Label Matrix for local noticing

HONOR FINANCE COMPANY C/O WESTLAKE PORTFOLIO

U.S. Bankruptcy Court

0752-1

4751 WILSHIRE BLVD

Eastern Division

Case 17-37328

SUITE 100

219 S Dearborn

Northern District of Illinois

LOS ANGELES, CA 90010-3847

7th Floor

Eastern Division

Chicago, IL 60604-1702

Fri Jul 3 07:05:59 CDT 2020

Bank of America

Bank of America N.A.

CAPITAL BANK

1701 River Oaks Dr # D

P O Box 982284

1 CHURCH ST SUITE 300

Calumet City, IL 60409-5053

El Paso, TX 79998-2284

ROCKVILLE, MD 20850-4190

City Of Chicago Department of Finance

City of Calumet City

City of Chicago Parking

C/O Arnold Scott Harris P.C.

Municipal Collections of America, Inc.

121 N. LaSalle St # 107A

111 W Jackson Blvd Suite 600

3348 Ridge Road

Chicago, IL 60602-1232

Chicago, IL 60604-3517

Lansing, IL 60438-3112

ComEd

Credit Management

DISCOVER BANK/GLELSI

1919 Swift Drive

25 Northwest Point Blvd #750

PO BOX 7860

Oak Brook, IL 60523-1502

Elk Grove Village, IL 60007-1058

MADISON, WI 53707-7860

(p)EMCC INC

ENHANCED RECOVERY

FED LOAN SERV

5401 N PIMA RD

8014 BAYBERRY RD

POB 60610

STE 150

JACKSONVILLE, FL 32256-7412

Harrisburg, PA 17106-0610

SCOTTSDALE AZ 85250-2630

FIRST PREMIER BANK

HARRIS & HARRIS LTD

Honor Finance

c/o Jefferson Capital Systems LLC PO Box

222 Merchandise Mart Plaza, Suite 1900

909 DAVIS ST STE 260

c/o Linda Dold

Chicago, IL 60654-1421

EVANSTON, IL 60201-3645

Saint Cloud, MN 56302

Honor Finance Company

IRS

KAY JEWELERS/GFS

c/o Westlake Portfolio Managemen

Po Box 7346

PO BOX 4480

4751 Wilshire Blvd

Philadelphia, PA 19101-7346

BEAVERTON, OR 97076-4480

Suite 100

Los Angeles, CA 90010-3847

Kahuna Payment Solutions

MABT TOTVISA

Municipal Collection Services

25 E Washington 1233

5109 S BROADBAND LANE

Po Box 666

c/o Fink Steven J

SIOUX FALLS, SD 57108-2208

Lansing, IL 60438-0666

Chicago, IL 60602-1876

Navient

Navient Solutions, LLC. on behalf of

PEOPLES ENGY

PO BOX 9655

Educational Credit Management Corporatio

200 EAST RANDOLPH

WILKES BARRE, PA 18773-9655

PO BOX 16408

CHICAGO, IL 60601-6302

St. Paul, MN 55116-0408

Premier Bankcard, Llc

Rogers Auto Group

SALLIE MAE

Jefferson Capital Systems LLC Assignee

2720 S Michigan Ave

PO Box 9500

Po Box 7999

Chicago, IL 60616-2819

Attn: Claims Processing

Saint Cloud Mn 56302-7999

Wilkes Barre, PA 18773-9500

SILVERLEAF/ORANGE LAKE
170 NORTH KOELLER ROAD
OSHKOSH, WI 54902-4108

Saint Leo University
PO Box 6665 MC 2097
Saint Leo, FL 33574-6665

Santander Consumer USA
ATT POC: Janiscia Jackson PO Box 961245
Fort Worth, TX 76161-0244

Southwest Credit
4120 International Pkwy # 1100
Carrollton, TX 75007-1958

St. Leo University
PO BOX 628301
Orlando, FL 32862-8301

U.S. Department of Education
C/O FedLoan Servicing
P.O. Box 69184
Harrisburg, PA 17106-9184

Village of Calumet City
204 Pulaski Rd
Calumet City, IL 60409-4115

Village of Orland Park
Municipal Collections of America, Inc.
3348 Ridge Road
Lansing, IL 60438-3112

West Asset Management
PO Box 790113
Saint Louis, MO 63179-0113

Isaiah T. Lawrence
4542 South Lamon Ave
Chicago, IL 60638-1958

Megan Holmes
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603-1811

Nicholas J Landi
Semrad Law Firm LLC
20 S. Clark Street #28
Chicago, IL 60603-1811

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Rigoberto Garcia
The Semrad Law Firm, LLC
20 S. Clark, 28th Floor
Chicago, IL 60603-1811

Tom Vaughn
55 E. Monroe Street, Suite 3850
Chicago, IL 60603-5764

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

EMCC FINANCE
33 RIVERSIDE DR
PEMBROKE, MA 02359

End of Label Matrix
Mailable recipients 44
Bypassed recipients 0
Total 44

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	CASE NO. 17 B 37328
Isaiah T. Lawrence,)	HON. Carol A. Doyle
)	CHAPTER 13
DEBTOR.)	

MOTION TO MODIFY PLAN

NOW COMES the Debtor, Isaiah T. Lawrence, by and through Debtor's attorneys, The Semrad Law Firm, LLC and hereby moves this Honorable Court to modify the confirmed Chapter 13 Plan, and Debtor states the following:

1. On December 18, 2017, Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. This Honorable Court confirmed the Debtor's Chapter 13 Plan of reorganization on February 13, 2018.
3. The confirmed Chapter 13 Plan allows for secured creditors to be paid 100.00% of their allowed claims, and general unsecured creditors without priority to be paid 10.00% of their allowed claims.
4. The confirmed Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$425.00 monthly for 36 months.
5. On July 24, 2018, this Honorable Court entered an Order modifying Debtor's confirmed Chapter 13 Plan and increased plan payments to \$480.00 per month for the remainder of the plan.
6. On March 26, 2019, this Honorable Court entered an Order modifying Debtor's confirmed Chapter 13 Plan and increased plan payments to \$530.00 per month for the remainder of the plan.

7. Following the filing of the instant case, Debtor submitted to payroll control. The payroll deductions had been consistent, however, on July 24, 2018 the plan payments were modified with the entry of the Order Modifying Plan. Furthermore, a second increase in the plan payments occurred with the entry of the Order Modifying Plan entered on March 26, 2019. However, Debtor's employer failed to deduct the modified plan payment amount on these two occasions. Due to the incorrect payment amounts, a default accrued in Debtor's plan payments.
8. On July 2, 2020, an Amended Payroll Control Order was filed in order to reflect the correct amount of the monthly plan payments.
9. Debtor can resume making timely plan payments moving forward.
10. Debtor needs the monthly plan payments to increase to \$640.00 per month in order to keep the plan feasible. Please see attached Exhibit A for Debtor's signed amended Schedules I and J.
11. Debtor respectfully requests this Honorable Court to defer the current plan default to the end of the plan of reorganization.
12. Debtor further requests this Honorable Court to increase the monthly plan payments to \$640.00 per month for the remainder of the plan in order to keep the plan feasible.
13. Debtor is in a position to proceed with the instant case.
14. Debtor filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, the Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order deferring the current plan default to the end of the Chapter 13 Plan of reorganization; and
- B. To increase Chapter 13 Trustee plan payments to the amount of \$640.00 per month for the remainder of the plan; and
- C. For such other and further relief as the Court deems fair and proper.

Respectfully submitted,
/s/ Nicholas Landi
Attorney for Debtor
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
312-913-0625